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Attorneys for Intercity Radiology, P.C.

UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
BUTTE DIVISION

UNITED STATES ex rel. REMBERT	)	Case No.: 15-cv-80-BU-SHE
and PARADISE,	)	
	)	Judge Sam E. Haddon
Relators,	)	
	)	
v.	)	<b>INTERCITY RADIOLOGY, P.C.'S</b>
	)	<b>MOTION FOR PROTECTIVE</b>
BOZEMAN HEALTH DEACONESS	)	<b>ORDER TO MAINTAIN</b>
HOSPITAL, et al.,	)	<b>CONFIDENTIALITY</b>
	)	
Defendants.	)	
	)	

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Non-Party Intercity Radiology, P.C. (“ICR”) files this Motion for a Protective Order to maintain the confidentiality of five privileged documents properly designated as confidential pursuant to the Stipulated Protective Order (Doc. 144) (the “Disputed Documents”), as well as portions of ICR attorney Thomas Greeson’s deposition transcript specifically discussing the content of these documents —four of which were used as deposition exhibits during his deposition (the “Disputed Designations”).<sup>1</sup> The grounds and support for this Motion are stated in detail in ICR’s Memorandum in Support of this Motion being filed herewith.

Pursuant to Local Rules 7.1(c)(1) and 26.3(c)(1), ICR has conferred with the parties regarding the disputed issues. Relators have indicated that they oppose the relief sought by this Motion; whereas, Defendants have indicated that they do not oppose it.

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<sup>1</sup> The Disputed Documents are the five documents produced as ICR DCT 00001 – 22, and the Disputed Designations are the following sections of the Greeson Deposition transcript, which specifically discuss the Disputed Documents: 71:12 – 75:21, 111:14 – 116:22, 136:20 – 140:1, 164:4 – 169:3, 174:19 – 177:9, 203:13 – 208:10, 229:20 – 232:9, 250:18 – 251:1, and 255:4-17. The Disputed Documents and Disputed Designations are simultaneously being filed under seal for *in camera* review pursuant to D. Mont. L.R. 5.1(b)(1), 26.4.

Dated: February 13, 2018

Respectfully submitted,

/s/ Lisa M. Noller

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of February, 2018, I have caused a copy of the foregoing to be filed with the Court's CM/ECF system which will serve a notice of electronic filing upon all counsel of record in this case.

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